UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: : Chapter 7

:

THE SWARTHMORE GROUP, INC. f/k/a

THE S GROUP, INC. : Bankruptcy No. 22-12040-amc

:

Debtor. : Hearing Date & Time: 11/29/23 at 12:30pm

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Terry P. Dershaw (the "<u>Trustee</u>"), the Chapter 7 trustee for the estate of Swarthmore Group, Inc. f/k/a the S Group, Inc. ("<u>Swarthmore</u>") has filed a Motion for Rule 2004 Document Production and Examination of Paula Mandle.

<u>Your rights may be affected</u>. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before November 19, 2023 (17 days after the date the notice was mailed) you or your attorney must do <u>all</u> of the following:
 - (a) file an answer explaining your position at

Clerk of Courts
United States Bankruptcy Court
Robert N.C. Nix Sr. Federal Courthouse
900 Market Street, Suite 400
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

John J. Richardson, Esquire
David A. Jones, Jr., Esquire
Alexandra L. Yuill, Esquire
BERNSTEIN-BURKLEY, P.C.
601 Grant Street, 9th Floor
Pittsburgh, PA 15219
Telephone: (412) 456-8100
Facsimile (412) 456-8135
Email: jrichardson@bernsteinlaw.com
djones@bernsteinlaw.com
ayuill@bernsteinlaw.com

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Ashley M. Chan on November 29, 2023, at 12:30 p.m. in Courtroom #4, Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Suite 204, Philadelphia, PA 19107.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: November 2, 2023 Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ John J. Richardson, Esquire John J. Richardson, Esquire PA I.D. #86045 jrichardson@bernsteinlaw.com 601 Grant Street, 9th Floor FHL Bank Building Pittsburgh, PA 15219

Phone: (412) 456-8100 Fax: (412) 456-8135

CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2023, I causes a copy of the foregoing to be served by electronic means through the ECF system and a copy emailed upon each of the following persons and parties, upon the following:

Debtors via First Class Mail

The Swarthmore Group, Inc. f/k/a The S. Group, Inc. 1650 Arch St.
Suite 2100
Philadelphia, PA 19103

Via ECF Notification

Debtor's Counsel

Douglas G. Leney, Esq. Archer & Greiner PC Three Logan Square 1717 Arch Street Suite 3500 Philadelphia, PA 19103

Trustee

Terry P. Dershaw, Esq. Dershaw Law Offices P.O. Box 556 Warminster, PA 18974-0632

U.S. Trustee

Office of the U.S. Trustee 900 Market Street, Suite 320 Philadelphia, PA 19107

/s/ John J. Richardson
John J. Richardson, Esq.